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11 | *Co-Counsel to the WHC Liquidation Trust*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

16 JEREMY ROSENTHAL, AS LIQUIDATION
17 TRUSTEE OF THE WHC LIQUIDATION
TRUST,

18 Plaintiff,

19 || v.

20 HALSEN HOLDINGS, LLC, a California
21 limited liability company; SOUTH TEXAS
22 ASSOCIATES & RESOURCES, a California
23 corporation; PENINSULA HEALTHCARE
24 MANAGEMENT LLC, a Nevada limited
25 liability company; DANIEL BROTHMAN, an
individual; EDITH BROTHMAN, an
individual; STACY SEAN FOWLER, an
individual; EDMUND C. KING, an
individual; and DOES 1 through 100,
inclusive,

26 | Defendants.

Case No. 5:23-cv-06216-PCP

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE &
[PROPOSED] ORDER**

Date: June 13, 2024

Time: 1:00 p.m.

Courtroom: 8

Judge: P. Casey Pitts

Complaint Filed: December 1, 2023

Trial Date: None

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Jeremy Rosenthal, as Liquidation
2 Trustee of the WHC Liquidation Trust (“Plaintiff”) and Defendants Halsen Holdings, LLC, South
3 Texas Associates & Resources, Peninsula Healthcare Management LLC, Daniel Brothman, Edith
4 Brothman, Stacy Sean Fowler, and Edmund C. King (“Defendants”) (collectively, the “Parties”)
5 hereby stipulate and agree as follows:

6 WHEREAS, on December 4, 2024, this Court entered an Initial Scheduling Order (Dkt. 5),
7 scheduling the Initial Case Management Conference (“CMC”) for March 5, 2024;

8 WHEREAS, the date of the CMC was reset by the Court for March 14 following
9 reassignment (Dkt. 14);

10 WHEREAS, on February 5, 2024, the Court granted, as modified, the Parties’ joint request
11 for extension of case management deadlines, setting the CMC to May 16, 2024 (Dkt. 16);

12 WHEREAS, on May 7, 2024, the clerk continued the CMC to June 13, 2024 (Dkt. 27);

13 WHEREAS, there have been no other time modification requests in this case;

14 WHEREAS, the Parties have since scheduled a mediation with Bruce Friedman on
15 August 28, 2024;

16 WHEREAS, in light of the Parties’ scheduled mediation date, the Parties jointly request that
17 the Court continue the CMC to September 5, 2024 or the next available date on the Court’s
18 calendar;

19 WHEREAS, the modifications requested would continue the scheduling for the case to after
20 a mediation has occurred, to allow the Parties to focus on mediation and to conserve the time and
21 resources of the Parties and the Court;

22 WHEREAS, in the event one of the Parties cancels the mediation, the Parties shall seek a
23 Court Order to advance the date of the CMC;

24 WHEREAS, Plaintiff has filed a Declaration in support of this Stipulation as required under
25 Local Rule 6-2(a).

26 **IT IS SO STIPULATED.**

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1 Dated: June 10, 2024

PERKINS COIE LLP

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9 *Counsel to Plaintiff*
10 *Jeremy Rosenthal, as Liquidation*
11 *Trustee of the WHC Liquidation Trust*

12 Dated: June 10, 2024

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13 By: /s/ Tad A. Devlin

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22 *Halsen Holdings, LLC, South Texas*
23 *Associates & Resources, Peninsula*
24 *Healthcare Management, LLC, Daniel*
25 *Brothman, Edith Brothman, Stacy Sean*
26 *Fowler, and Edmund C. King*

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Attestation Pursuant to Civil Local Rule 5-1(i)(3)

I, Paul S. Jasper, attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: June 10, 2024

/s/ Paul S. Jasper

Paul S. Jasper, Bar No. 200138

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2024

Hon. P. Casey Pitts
United States District Judge